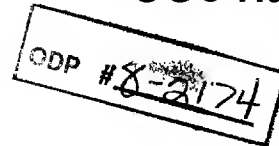


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Privacy
OGC Has Reviewed



OGC 78-7949
30 November 1978

25X1A

MEMORANDUM FOR: [REDACTED]
25X1A Information & Privacy Staff
FROM : [REDACTED]
Office of General Counsel
SUBJECT : Application of the Privacy Act to the
"General Station Information Data Base"

1. We are in receipt of your memorandum of 28 November and the attached documents concerning the "General Station Information Data Base."

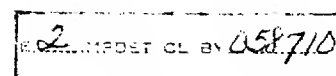
2. As we understand the situation, this data base will be utilized by the Communications Support Staff/OSO to maintain (1) General Station Information and (2) Station Communication Authorizations in order to track the capabilities of CIA [REDACTED] Communication Stations.

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3. We further undersand that although this file was not designed to be accessed by personal name, the capability for such access exists since the file will be maintained as a RAMIS data base.

4. As to the applicability of the Privacy Act, the term "system of records" is controlling. A file is a "system of records" for purposes of the Privacy Act if records therein can be retrieved by individual identifiers (i.e., there is an indexing or retrieval capability using identifying particulars such as name, number or other descriptor built into the system), and the agency does, in fact, retrieve records about individuals by reference to some personal identifier. It is thus the opinion of the Office of General Counsel that the subject data base need not be declared in our Privacy Act Regulations (32 CFR Part 1901) and will not be subject to the Privacy Act provided that records are not retrieved by reference to some personal identifier (most often, a name or employee number) notwithstanding the fact that such a capability exists.

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5. Please note that opinion is reserved with respect to an expanded system which would include categories 3, 4 and 5 as set forth in page 1 of ODP-8-5208.



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Attachments

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UNCLASSIFIED		CONFIDENTIAL		SECRET	
OFFICIAL ROUTING SLIP					
TO	NAME AND ADDRESS		DATE	INITIALS	
1	[REDACTED] ED/ODP				
2	2-D-00				
3	DX-6 GREEN				
4					
5	Copy to C/DD/ODP-12/4/78.				
6					
ACTION		DIRECT REPLY		PREPARE REPLY	
APPROVAL		DISPATCH		RECOMMENDATION	
COMMENT		FILE		RETURN	
CONCURRENCE		INFORMATION		SIGNATURE	
Remarks: <p><i>George,</i> <i>Attached is a copy of an OGC memorandum regarding OSO/Sigint proposed records system. Please note para 5.</i></p> <p style="text-align: right;"><i>Don</i></p> <p><i>RE: ODP 8-1903</i> <i>18 Oct 78</i></p>					
FOLD HERE TO RETURN TO SENDER					
FROM: NAME, ADDRESS AND PHONE NO.				DATE	
[REDACTED] 7486				12/1/78	
UNCLASSIFIED		CONFIDENTIAL		SECRET	

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